



## U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

July 19, 2022

**BY EMAIL**

The Hon. Ona T. Wang  
United States District Court for the  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

MEMO ENDORSED

**Re: United States v. Ethan Nguyen and Andre Llacuna, 22 Mag. 2478**

Dear Judge Wang:

The Government writes, with consent of defendant Ethan Nguyen and defendant Andre Llacuna, to request an extension *sine die* to review the electronic devices listed below (the “Electronic Devices”), which were seized pursuant to a judicially-authorized search warrant in the Central District of California and attached hereto as Exhibit A (the “California Warrant”). The Electronic Devices were seized on March 24, 2022. Pursuant to the California Warrant, law enforcement is required to search the Electronic Devices within 120 days, which expires on July 22, 2022. Both defendants have submitted applications to the Youth Adult Opportunity Program (“YAOP”), which remain pending. As a result of the pending YAOP applications and pre-indictment plea negotiations, the Government agreed to stop the Electronic Devices review. The Electronic Devices are in the Southern District of New York. The Government conferred with defense counsel prior to this request and neither counsel objects.

**Seized Electronic Devices**

Device Description	Qty	Owner
Ledger Nano X w/Seeds 3760027781517 3760027781500 3760027781500	3	LLACUNA, ANDRE
Ledger Nano S w/ Seeds	2	LLACUNA, ANDRE
Green Sandisk Thumbdrive Serial No. BN200657706W	1	LLACUNA, ANDRE
Apple MacBook Pro A1989 S/N C02Y343CJHC9 + powercord	1	LLACUNA, ANDRE

07/20/2022